



U.S. Department of Justice

United States Attorney Eastern District of New York

MKP F. #2017R01840 271 Cadman Plaza East Brooklyn, New York 11201

April 2, 2019

By ECF

The Honorable Nicholas G. Garaufis United States District Judge United States District Court 225 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.

Criminal Docket No. 18-204 (NGG)

Dear Judge Garaufis:

The government respectfully submits this letter attaching the government's proposed juror questionnaire, which is largely agreed-upon by the parties. The parties will confer on Exhibit A and submit that to the Court no later than tomorrow. The government respectfully requests permission to provide the Court with proposed Exhibit A under seal because it will contain the name of victims and others who have not been publicly identified.

The parties also jointly request that the Court issue an order preventing public release of prospective jurors and empaneled jurors' names until after trial and requiring that jurors be identified only by juror number in open court. See United v. Shkreli, 15-CR-637

(KAM), Memorandum and Order, dated June 25, 2017, (Dkt. No. 259), at 16. The parties may also request additional precautions be taken to protect jurors' identities until after trial.

Respectfully submitted,

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cc: Clerk of Court (NGG) (by ECF)
Counsel of Record (by ECF)